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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DANIEL CHARTRAW,  
  
Defendant.

CASE NO. 2:24-CR-311 DC

STIPULATION TO SET TRIAL AND  
EXCLUDE TIME UNDER SPEEDY TRIAL  
ACT; [PROPOSED] FINDINGS AND ORDER

DATE: November 14, 2025  
TIME: 9:30 a.m.  
COURT: Hon. DENA COGGINS

**STIPULATION**

1. By previous order, this matter was set for status on November 14, 2025.
2. By this stipulation, defendant and the United States jointly now move to set trial in the case for April 27, 2026, and to exclude time between November 14, 2025, and April 27, 2026, under Local Code T4.
3. The parties stipulate and request that the schedule be set as follows:

Trial Commences:	April 27, 2026
Trial Confirmation Hearing:	March 13, 2026
Hearing on R. 12 Motions	February 13, 2026
Reply	Jan 30, 2026
Opposition to R. 12 Motions	January 23, 2026
Rule 12 Motions Filed	January 9, 2026

1 4. The parties agree and stipulate, and request that the Court find the following:

2 a) The government has produced over 4,500 pages of discovery associated with this  
3 case, which includes financial documentation, investigative reports, location tracing information,  
4 records of cryptocurrency transactions, and witness reports, in addition to voluminous  
5 productions of digital data obtained from remote computing services. All of this discovery has  
6 been either produced directly to counsel and/or made available for inspection and copying.

7 b) In addition to the produced discovery, the government is also working on a  
8 forensic extraction of a relevant cell phone. Since the last update, the government has completed  
9 the filter protocol. The government has offered to produce the full cell phone extraction, as well  
10 as extensive email returns, to defense counsel on a hard drive provided by defense counsel.

11 c) Counsel for the defendant has represented that the produced discovery consists of  
12 at least 6 large binders, in addition to the electronic evidence, and that he has not yet had an  
13 opportunity to complete his review of the produced discovery. Counsel for the defendant has  
14 represented that he is currently in trial, which has impacted his ability to review discovery.  
15 Counsel for the defendant has also represented that he is conducting his own investigation.

16 d) Since the last status update, the time extended for consideration of the  
17 government's plea offer expired.

18 e) Counsel for defendant desires additional time to review the discovery, conduct  
19 additional investigation, consider appropriate motions for filing and potential defenses, and to  
20 otherwise prepare for trial.

21 f) Counsel for defendant believes that failure to grant the above-requested  
22 continuance would deny counsel the reasonable time necessary for effective preparation, taking  
23 into account the exercise of due diligence.

24 g) Based on the above-stated findings, the ends of justice served by continuing the  
25 case as requested outweigh the interest of the public and the defendant in a trial within the  
26 original date prescribed by the Speedy Trial Act.

27 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
28 et seq., within which trial must commence, the time period of November 14, 2025 to April 27,

2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 5, 2025

Eric Grant  
United States Attorney

/s/ JESSICA DELANEY  
JESSICA DELANEY  
Assistant United States Attorney

Dated: November 5, 2025

/s/ ANDREW FLIER  
ANDREW FLIER  
Counsel for Defendant  
Daniel Chartraw

**[PROPOSED] FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

THE HONORABLE DENA COGGINS  
UNITED STATES DISTRICT JUDGE